

From: [Bird, Patrick](#)
To: [Denise Lopez](#)
Subject: RE: Minor Air Source Permit - Medrecycler
Date: Thursday, April 29, 2021 4:53:00 PM
Attachments: [image001.jpg](#)

Hi Denise,

Thank you for contacting us with your questions. Please find our responses below:

- Has the EPA provided approval on minor air source permit or just RI DEM?

Rhode Island Department of Environmental Management (RI DEM) is the permitting authority for minor New Source Review (NSR) in the State of Rhode Island. EPA has approved the state's minor NSR permitting *program* as being consistent with the Federal minor NSR requirements, however individual permits are issued by RI DEM. The EPA does not have a role in approving individual minor NSR permits in the State of Rhode Island. Medrecycler's minor NSR air permit was issued by RI DEM in May 2020.

- Did EPA designate their process as pyrolysis?

MedRecycler- RI has not requested a formal applicability determination from EPA. EPA did however review the proposed operation and provided some feedback to RI DEM on the operation and applicability of Federal regulations. Below is the information we provided to RI DEM air permitting staff about MedRecycler- RI's operations and exclusions for pyrolysis in the Federal regulation for hospital/medical/infectious waste incinerators, 40 CFR Part 60 Subpart Ec.

"Subpart Ec regulates hospital/medical/infectious waste incinerators. Section 60.50c(f) excludes pyrolysis units as defined in Section 60.51c. Pyrolysis is defined in Subpart Ec to mean the endothermic gasification of hospital waste and/or medical/infectious waste using external energy. Based on our review of the information provided, and because the pyrolysis reactors will feed medical waste material in an endothermic process using external energy, in the absence of oxygen, the pyrolysis reactors are excluded from being regulated under Subpart Ec."

If you have any additional questions, please feel free to reach out.

Pat

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From: Denise Lopez <denisealopez35@gmail.com>
Sent: Monday, April 26, 2021 11:01 AM
To: Bird, Patrick <Bird.Patrick@epa.gov>
Subject: Minor Air Source Permit - Medrecycler

Hi Patrick.

Hope all is well . I wanted to clarify the following statements made on the Medrecycler investor pages today ...

- has the EPA provided approval on minor air source permit or just RI DEM ?

- did EPA designate their process as pyrolysis?

Any information you can provide would be greatly appreciated.

Regards,
Denise Lopez



Sent from my iPhone